

Message

From: Crosby-Vega, Terri [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E439D8D14EAF4F8DA8661E95A3037052-CROSBY-VEGA, TERRI]
Sent: 9/7/2016 3:02:48 PM
To: Gerhard, Sasha [Gerhard.Sasha@epa.gov]
Subject: FW: Eglin Air Force Base RCRA permit for open burning / open detonation

Terri Crosby-Vega
Environmental Engineer
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From: Crosby-Vega, Terri
Sent: Friday, September 02, 2016 4:35 PM
To: 'Frances Dunham' <[REDACTED]> **Personal Email / Ex. 6**
Cc: 'Laura Olah' <info@cswab.org>
Subject: RE: Eglin Air Force Base RCRA permit for open burning / open detonation

Hi Frances,

The EPA is working on the issues associated with OB/OD to "Explore ways to better manage certain explosive wastes and reduce contamination from OB/OD operations." I will try to answer your questions and concerns. We meet monthly with all EPA Regions and States to discuss the issues of OB/OD. We are trying to be more consistent and address some of the concerns that you have raised with the Eglin Permit.

Annual Limit-Unless it is specified in their Part B Permit Application, I would have to agree with the FDEP staff that the Eglin permit contains no specified annual limit by weight for OB/OD at Eglin. However, I have not reviewed their Part B Application. The Part B Application should have sufficient information included in its sections to write a permit for the facility. The Part B should also specify the hazardous waste that will be managed in each hazardous waste management unit. The Part B requirements can be found in 40 CFR Section 270.

Prohibited Wastes-Other states may prohibit open burning and open detonation of certain wastes, such as depleted uranium, red and white phosphorus, incendiaries, riot control gear, 50 mm rounds, etc. The prohibition of some wastes may also be regulated by other agencies (i.e. Nuclear Regulatory Commission). Again, all hazardous waste managed at Eglin should be identified in the Part A and Part B Applications. (The Part A Application should include all waste codes associated with operations at the facility.)

Permit Modifications and Emergency Permits-The permit modifications and emergency permits should be such as defined in the 40 CFR Section 270 Subpart D.

Other-In reviewing Eglin's Permit, I noted their clause for a Waste Minimization Program Plan in Condition II.A.13 that states:

13. The Permittee shall develop and maintain a Waste Minimization Program Plan. The Permittee shall maintain copies of the certification required by this Condition in the facility operating record for a minimum of three years. The Permittee must certify, no less often than annually, the following.

a. The Permittee has a program in place to reduce the volume and toxicity of hazardous waste generated to the degree determined by the Permittee to be economically practicable.

b. The proposed method of treatment, storage or disposal is the most practicable method available to the Permittee, which minimizes the present and future threat to human health and the environment.

Eglin is required to certify annually that the proposed method of treatment is the most practicable method available which minimizes the present and future threat to human health and the environment. Eglin is also required to submit a Biennial Report that identifies all the wastes and quantities treated at their facility.

I hope this answers some of your questions. FDEP is authorized to issue the Hazardous Solid Waste Amendments Permits in Florida. I would advise you to request to be put on the FDEP mailing list so that you may be informed whenever the Eglin Permit is modified or up for renewal. The mailing list notification should provide information on how you may formally comment on any permit modifications or renewals. All comments are required to be addressed prior to issuance of the Permit.

As previously stated, the EPA is working on the issues associated with OB/OD to "Explore ways to better manage certain explosive wastes and reduce contamination from OB/OD operations." I thank you for your concerns in our on-going effort. Please let me know if I can assist you any further.

Regards,
Terri

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From: Frances Dunham [redacted] **Personal Email / Ex. 6**

Sent: Wednesday, August 17, 2016 1:45 PM

To: Crosby-Vega, Terri <Crosby-Vega.Terri@epa.gov>

Cc: Laura Olah <info@cswab.org>

Subject: Eglin Air Force Base RCRA permit for open burning / open detonation

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Terri,

I am attempting to learn whether the Eglin Air Force Base permit (*attached*) places any prohibitions on the the kinds of "hazardous waste explosives and military munitions that are no longer suitable for service" [generated at Eglin or coming from Hurlburt Field, Tyndall AFB, Pensacola NAS, Panama City NSA (*see p.2*)] that may be treated by open burning / open detonation anywhere on Eglin.

Florida Department of Environmental Protection Agency staff with whom I've been in contact have been unable to direct me to any permit language that specifies what wastes may be so treated or permit language that specifies what wastes may not. I have been left with the understanding that ob/od is allowed for all wastes generated at Eglin and the other 4 sites; is that correct?

I believe that other states prohibit open burning and open detonation of certain wastes, such as depleted uranium, red and white phosphorus, incendiaries, riot control gear, 50 mm rounds, etc. Is there no such prohibition at Eglin or other Florida ob/od sites, civilian or military?

What are the circumstances under which an Eglin permit modification or emergency permit would be required?

Also, do you agree with the opinion of FDEP staff that, since the Eglin permit contains no specified annual limit by weight for ob/od at Eglin, the only annual limit can be calculated using 3,000 pounds/event x 4 events/day x 365 days/year x 2 facilities, which totals 8,760,000 pounds?

I greatly appreciate any help you can offer in answering these questions.

Thank you.

Frances Dunham

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